

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

CARLA CALOBRISI)	
Plaintiff,)	
)	
v.)	
)	Case No. 1:14-cv-00996-AJT-MSN
BOOZ ALLEN HAMILTON INC.,)	
Defendant.)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL EX. 6 TO PLAINTIFF'S
MOTION AND MEMORANDUM IN SUPPORT OF MOTION IN LIMINE**

Plaintiff Carla Calobrisi, by and through her attorneys, moves this Honorable Court pursuant to Local Civil Rule 5 of this Court for leave to file under seal Exhibit 6 to Plaintiff's Motion and Memorandum in Support of Motion in Limine. In support of its motion, Plaintiff states as follows:

Exhibit 6 contains information specifically designated Confidential and as Attorneys' Eyes Only pursuant to the terms of the Court-approved Second Agreed Protective Order. (Doc. No. 104.) The Second Agreed Protective Order also prohibits the unrestricted disclosure of confidential material "that reveals a trade secret, or other confidential research, development, or financial information that is commercially sensitive, or that otherwise is entitled to protective treatment under Fed. R. Civ. P. 26(c), and personal information that is protected from disclosure by statute, regulation, or otherwise entitled to protection from public disclosure." (*Id.*)

Local Civil Rule 5 provides the possibility of filing confidential, unredacted, pleadings under seal. Exhibit 6 to Plaintiff's Motion in Limine was designated confidential and Attorneys' Eyes Only. This confidential material should not be made publicly available. Accordingly, Plaintiff Calobrisi respectfully moves for leave to file Exhibit 6 to Plaintiff's Motion and Memorandum in Support of Motion in Limine under seal.

Respectfully Submitted,

/s/ John R. Ates

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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2015, I served the foregoing through the Court's electronic filing system to the following, which will then send a notification of such filing ("NEF") to counsel identified below:

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